LAW OFFICE OF KEVIN J. KEATING, P.C.

Kevin J. Keating Attorney at Law

Counsel: Stefani Goldin, Esq. USDC SDNY Carden City, New York 11530 kevin@kevinkeatinglaw.com

ELECTRONICALLY FILED T: 516-222-1099

Manhattan Office (BY APPOINTMENT) T: 212- 964-2702

March 4, 2020

VIA ECF

Honorable Lewis A. Kaplan United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. Melamed 19CR443 (LAK)

Dear Judge Kaplan:

As you are aware, I am counsel for Mr. Melamed in the captioned matter. Previously, Your Honor set a motion schedule in this matter which set the date for filing of defense motions on March 9, 2020. I write to respectfully request a one week extension of this date to March 16, 2020. The basis for this request is that I am still awaiting certain materials from the Government which bear on the motions I will be filing. Moreover, my ability to communicate with my client concerning these matters has been impacted by the lock-down currently in place of the Metropolitan Correctional Center.

I have conferred with AUSA Thomas John Wright concerning this application who offers his consent. Should Your Honor grant this request, the parties agree that the Government's date to file any opposition to defense motions should likewise be extended one week.

Thank you for your consideration.

Very truly yours,

SO ORDERED Mules

EWIS A. KAPLAN, USDJ 3 9 2020

Kevin J. Keating

KJK:sep

cc: AUSA Thomas John Wright